

did conspire with persons known and unknown to the Grand Jury, to violate the federal kidnapping statute, Title 18, United States Code, Section 1201, that is, they conspired to unlawfully and willfully seize, confine, inveigle, decoy, kidnap, abduct, carry away and hold for ransom, reward or otherwise victims, and in committing or in furtherance of the commission of the offense travel in interstate commerce and use a means and facility of interstate commerce.

### **THE PURPOSE AND OBJECTS OF THE CONSPIRACY**

1. It was a purpose and object of the conspiracy for SUMMERSON to recruit female victims into prostitution under the direction of WASHINGTON.
2. It was further a purpose and object of the conspiracy for SUMMERSON and WASHINGTON to extort ransom money for the return of the victims.

### **MANNER AND MEANS OF THE CONSPIRACY**

The manner and means by which the conspirators sought to accomplish the objects of the conspiracy included, but were not limited to the following:

1. SUMMERSON would hold female victims against their will, while often physically assaulting the victim and/or transporting her across state lines.
2. SUMMERSON would coerce the victims into working as prostitutes for WASHINGTON, and WASHINGTON would employ prostitutes that SUMMERSON coerced.
3. If the victim would not work as a prostitute for WASHINGTON, then SUMMERSON would extort or attempt to extort money for the victim's return. SUMMERSON would make said ransom demands via phone or internet.
4. SUMMERSON and WASHINGTON would collaborate on creating or maintaining an online account in which the ransom funds were to be deposited.

### **OVERT ACTS IN FURTHERANCE OF THE CONSPIRACY**

In furtherance of the conspiracy and to accomplish its purpose and objects, at least one of the conspirators committed at least one of the following overt acts within the

Western District of Tennessee:

1. On or about January 28, 2020, SUMMERSON kidnapped S.F., transported her from Georgia to South Carolina, and made ransom demands for S.F.'s return via phone and internet to V.F. in Memphis, Tennessee.

2. Between on or about January 9, 2020, and on or about January 11, 2020, SUMMERSON kidnapped C.S. from New Jersey, transported her across state lines, and discussed with WASHINGTON via text messages the coercion of C.S. into prostitution and the creation of an online account for the deposit of ransom funds.

All in violation of Title 18, United States Code, Section 371.

## **COUNT 2**

### **(Conspiracy to Transmit Ransom Demands via Interstate Communications)**

Beginning on or about June 25, 2019, and continuing until on or about January 27, 2021, in the Western District of Tennessee and elsewhere, the defendants,

**BRIAN SUMMERSON  
and  
PIERRE WASHINGTON**

did conspire with persons known and unknown to the Grand Jury, to violate the federal extortion statute, Title 18, United States Code, Section 875(a), that is, they conspired to knowingly and with intent to extort, transmit in interstate commerce, cellular phone and internet communications, which said communications contained demands and requests for sums of money, as ransom and reward for the release of victims who had been kidnapped and held for ransom and reward.

### **THE PURPOSE AND OBJECTS OF THE CONSPIRACY**

1. It was a purpose and object of the conspiracy for SUMMERSON to recruit



female victims into prostitution under the direction of WASHINGTON.

2. It was further a purpose and object of the conspiracy for SUMMERSON and WASHINGTON to extort ransom money for the return of the female victims.

#### **MANNER AND MEANS OF THE CONSPIRACY**

The manner and means by which the conspirators sought to accomplish the objects of the conspiracy included, but were not limited to the following:

1. SUMMERSON would hold female victims against their will, while often physically assaulting the victim or transporting her across state lines.

2. SUMMERSON would coerce the victims into working as prostitutes for WASHINGTON. In turn, WASHINGTON would employ prostitutes that SUMMERSON coerced.

3. If the victim would not work as a prostitute for WASHINGTON, then SUMMERSON would extort or attempt to extort money for the victim's return. SUMMERSON would make said ransom demands via phone or internet.

4. SUMMERSON and WASHINGTON would collaborate on creating or maintaining an online account in which the ransom funds were to be deposited.

#### **OVERT ACTS IN FURTHERANCE OF THE CONSPIRACY**

In furtherance of the conspiracy and to accomplish its purpose and objects, at least one of the conspirators committed at least one of the following overt acts within the Western District of Tennessee.

1. On or about January 28, 2020, SUMMERSON kidnapped S.F., transported her from Georgia to South Carolina, and made ransom demands for S.F.'s return via phone and internet to V.F. in Memphis, Tennessee.

2. Between on or about January 9, 2020, and on or about January 11, 2020, SUMMERSON kidnapped C.S. from New Jersey, transported her across state lines, and discussed with WASHINGTON via text messages the coercion of C.S. into prostitution and the creation of an online account for the deposit of ransom funds.

All in violation of Title 18, United States Code, Section 371.

**COUNT 3**

Between on or about January 27, 2020, and on or about January 28, 2020, in the Western District of Tennessee and elsewhere, the defendant,

**BRIAN SUMMERSON**

did unlawfully and willfully seize, confine, inveigle, decoy, kidnap, abduct, carry away and hold for ransom, reward or otherwise S.F., and in committing or in furtherance of the commission of the offense traveled in interstate commerce from Georgia to South Carolina, and did use a means and facility of interstate commerce, that is phone and internet communications to V.F. in Memphis, Tennessee. All in violation of Title 18, United States Code, Section 1201(a)(1).

**COUNT 4**

On or about January 28, 2020, in the Western District of Tennessee and elsewhere, the defendant,

**BRIAN SUMMERSON**

knowingly and with intent to extort, did transmit in interstate commerce, that is from Georgia to Memphis, Tennessee and from South Carolina to Memphis, Tennessee, a cellular phone and internet communication to V.F., which said communication contained a demand and request for a sum of money, as ransom and reward for the release of S.F., who had been kidnapped and was then being held for ransom and reward. All in violation of Title 18, United States Code, Section 875(a).

**A TRUE BILL:**

\_\_\_\_\_  
**FOR PERSON**

**DATED:** \_\_\_\_\_

\_\_\_\_\_  
**JOSEPH C. MURPHY, JR.**  
**ACTING UNITED STATES ATTORNEY**